UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF NEW YORK

DR. KAMIAR ALAEI,

Plaintiff,

NOTICE OF MOTION

-against-

21-CV-0377 (BKS)

STATE UNIVERSITY OF NEW YORK AT ALBANY,

Defendant.

PLEASE TAKE NOTICE that upon Defendant's Memorandum of Law in Support of Motion *in Limine*, ECF No. 110, the Court's Memorandum-Decision and Order, ECF No. 141, the accompanying memorandum of law, and upon all prior proceedings, Defendant, State University of New York at Albany, on a date and time to be scheduled upon filing by the Clerk of Court, or as soon thereafter as counsel can be heard, will make a motion at the United States District Court, Northern District of New York, Syracuse, New York, pursuant to Rule 60(b) of the Federal Rules of Civil Procedure and Local Rule 60.1, for reconsideration of Defendant's Motion *in Limine*, and an order (1) permitting Defendant to introduce the Title IX investigative report into evidence; and (2) precluding Plaintiff from attempting to impeach a non-party witness about findings in an unrelated litigation that the witness's prior conduct "indicated some misjudgment" and she used an "unfortunate tone," together with such other or further relief as may be just.

Dated: Albany, New York June 12, 2025

LETITIA JAMES New York State Attorney General Attorney for Defendant The Capitol Albany, New York 12224-0341

Email: David.White@ag.ny.gov

By: _____ Matthew J. Gallagher

Assistant Attorney General Bar Roll No. 701111

Telephone: 518-776-2284

Email: Matthew.Gallagher@ag.ny.gov

To (via ECF):
All counsel of record